

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

JUDICIAL WATCH, INC.,  
and TRUE THE VOTE,

*Plaintiffs,*

v.

J. BRADLEY KING, *et al.*

*Defendants.*

Case No. 1:12-cv-800-WTL-TAB

**PLAINTIFFS' PRELIMINARY WITNESS AND EXHIBIT LIST**

Plaintiffs Judicial Watch and True the Vote, by counsel, hereby provides notice to the Court and to the Defendants of the witnesses and exhibits Plaintiffs believe they may introduce at trial. Plaintiffs may not call all of the witnesses on this list, and Plaintiffs reserve the right to supplement this list as trial preparations progress. Witness addresses and telephone numbers reasonably available to Plaintiffs have been provided in Plaintiffs' initial disclosures, served today on Defendants.

**Witnesses**

1. J. Bradley King, Co-Director, Indiana Election Division
2. Trent Deckard, Co-Director, Indiana Election Division
3. Connie Lawson, Indiana Secretary of State
4. Beth Mulry, Clerk of the Circuit Court, Brown County
5. Edna Brown, Clerk of the Circuit Court, Crawford County
6. Karla Bauman, Clerk of the Circuit Court, Franklin County
7. Marcia Moore, Clerk of the Circuit Court, Hancock County
8. Katie Grant, Clerk of the Circuit Court, Newton County

9. Roger Purkhiser, Clerk of the Circuit Court, Orange County
10. Fran Satterwhite, Clerk of the Circuit Court, Scott County
11. Gina Pennington, President, Spencer County Election Board
12. Gay Ann Harney, Clerk of the Circuit Court, Spencer County
13. Debbie Tragesser, Clerk of the Circuit Court, Tipton County
14. Susan Ray, Clerk of the Circuit Court, Union County
15. Deb Hiatt, Clerk of the Circuit Court, Warren Court
16. Sarah (Topper) Redman, Clerk of the Circuit Court, Warrick County
17. Tom Fitton, President, Judicial Watch, Inc.
18. Catherine Engelbrecht, President, True the Vote
19. Additional individuals identified by Defendants in their initial disclosures or preliminary or final witness lists, or revealed through discovery.
20. Any expert(s) Defendants may retain and designate to testify by the deadline set in the parties' Joint Case Management Plan.

**Exhibits**

1. Documents that relate to U.S. Census population data for Indiana.
2. Documents that relate to U.S. Election Assistance Commission Report voter registration data for Indiana.
3. Public filings in the lawsuit captioned *U.S. v. State of Indiana, et al.*, Case No. 1:06-cv-01000-RLY-TAB (S. D. Ind.).
4. Media accounts that relate to Indiana's level of compliance with Section 8 of the National Voter Registration Act.

5. Additional documents identified by Defendants in their initial disclosures or preliminary of final exhibit lists, or produced by the Defendants in this litigation in discovery or in response to requests from Plaintiffs.
6. Documents relied upon by any expert(s) Defendants may retain and designate to testify by the deadline set in the parties' Joint Case Management Plan.

Dated: November 19, 2012

Respectfully submitted,

	<p><u>/s/ Chris Fedeli</u> Paul J. Orfanedes Chris Fedeli Admitted <i>Pro Hac Vice</i></p> <p>JUDICIAL WATCH, INC. 425 Third Street S.W., Ste. 800 Washington, DC 20024 Tel: (202) 646-5172 Fax: (202) 646-5199 Email: porfanedes@judicialwatch.org cfedeli@judicialwatch.org</p> <p>David R. Langdon Joshua B. Bolinger</p> <p>LANGDON LAW LLC 8913 Cincinnati-Dayton Rd. West Chester, Ohio 45069 Tel: (513) 577-7380 Fax: (513) 577-7383 Email: dlangdon@langdonlaw.com jbolinger@langdonlaw.com</p> <p><i>Attorneys for Plaintiffs</i></p> <p><i>Of Counsel:</i></p> <p>J. Christian Adams</p> <p>ELECTION LAW CENTER, PLLC 300 N. Washington Street, Ste. 405 Alexandria, VA 22314</p>
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 19<sup>th</sup> day of November, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Chris Fedeli  
Chris Fedeli